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In the matter of 1998 biennial Regulatory Review--Amendment  
of Part 97 of the Commission's Amateur Service Rules, FCC WT  
Docket 98-143

TO: Magalie Roman Salas, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
1919 M St, Washington DC 20554

FRO!!: Alex Fnnke, KC6IWR

28 August 1998

I would like to comment upon the proposed rulemaking by the FCC with regard to the future of the Amateur Radio Service license.

I have held my Novice-with-Code license for about six years. I am proud that I am a member of the chain of amateur radio operators who have their roots in the Morse tradition. HOWEVER, I do appreciate that times are changing and that the most important effort we have before us is to attract more individuals, especially young people, to Ham Radio

Therefore, I applaud the notion of reducing the number of license categories to four:

1. A no-code Technician license which could be advertised to those experimenters who want to work in the upper frequencies and whose interests lie less with old-time "rag chews" or contests, and lie instead with realtime TV, telemetry, spread spectrum and other high-tech applications. Just get them in. Just as 10 Mhz used to be considered the domain of the wierdos and the boy scientists, so today the domain above 50Mhz is where the new discoveries will be found.
2. The General class license, which would be a code license, hopefully with expanded frequency allocations.
3. The Advanced class, much as it is today
4. and the Extra class, also much as is today

I believe that the most benefit to Amateur Radio will come from the new Tech class and the rejuvenated General class. It's quite likely that the Advanced and Extra classes will stay pretty much as they are today in composition: and that's fine, especially if the FCC would make the General Class much more attractive.

First, as I said, a redistribution of frequencies to the Generals would be very helpful. It could be the legitimate final step for many hams.

Second, why not modify the code requirement (subject to the approval of the IARU) to be a compromise 10wpm? Let the code test be a question of comprehension; that is, give a fairly long test and require accurate information to be gotten from it. Instead of 'perfect copy' of a section, require that, say, 20 information items be gotten from the test transmission: several QTH's, dates and frequencies, weather, some electronic terms and so on. The purpose of the code is to exchange information, not to study the intricacies of Robert Frost's poetry! Make the test consist of a transmission and a 30-question exam requiring near-exact copy of the details. The FCC should set exact rules for the way that this is to be done by the volunteer examiners, so that there can be no tweaking of the test to discriminate against any examinee. There should be an informal complaint process for anyone who feels that he has not gotten a fair shake; the right to see the correct answers, to confront the person responsible for the code test, the right to challenge a no-pass grade.

Those who are physically challenged and cannot write should be able to pass and oral test, in which the 'details' are sent and the examiner then gets a verbal copy. There should be no discrimination against anyone who cannot take the exam in the standard way; but also there should not be anyone passed who has not actually taken the test in some way.

I don't think that the FCC should change the code requirements for the two highest classes. Let these be challenge classes, like being admitted to the Boston Marathon, for those who enjoy meeting

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and beating challenges.

I understand that there is a proposal on the table for changing the written **exams** to include **more** questions about the **modern modes of communications**. I think this would be a bad idea. More to the point would be to increase the questions on basic electronic theory. The **exam** should address **two** issues: one, is the applicant knowledgeable enough about the FCC and international **rules** for radio operation so they will be competent, safe, and not be nuisances on the air. Second, does he/she know enough basic theory to be able to be more than an "appliance operator" and be able to work efficiently with the **equipment**? This **means** more questions on the **rules**, and **more** questions on theory--but not bringing in details such as 'how does spread **spectrum** work' (say), which might be of interest to some but is certainly not essential to the normal work of the **Amateur**.

I urge that no provision be **made** requiring **some** kind of approval by upper-class operators (such as log-book approval, etc). This could be used as a lever to preserve the upper classes, and even General class, for the few. In addition, there are **hams** who simply like to be loners and don't want to seek out other **hams** to approve their standing.

My appreciation for the chance to address the FCC on this important topic.

Sincerely,

Alex Funke

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